

JUDGE STEIN

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

04 CV 10108

#5

**JANE DOE I, JANE DOE II AND
JANE DOE III,**

Plaintiffs,

v.

**EMMANUEL CONSTANT,
a.k.a. TOTO CONSTANT,**

Defendant.

Civil Action No. _____

**PLAINTIFFS' EX PARTE MOTION FOR
LEAVE TO FILE COMPLAINT AND
ACCOMPANYING PAPERS UNDER
SEAL**

2004 DEC 22 AM 10:01



Plaintiffs, by and through counsel, hereby move this Court for an order permitting the filing of the Complaint and accompanying papers, including the summons, civil cover sheet, and Motion for Leave to File Complaint as Pseudonymous Plaintiffs, under seal. The reasons for the motion appear in the Declaration of Jennifer Green attached hereto.

For these reasons and such other reasons as may appear just to the Court, Plaintiffs requests that their motion for leave to file a sealed complaint and accompanying papers be granted.

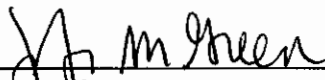
//

//

//

Dated: December 21, 2004

Respectfully submitted,


Jennifer Green (NY Bar No. JG-3169)
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, NY 10012
Tel: (212) 614-6464
Fax: (212) 614-6499

Matthew Eisenbrandt
Moirá Feeney
CENTER FOR JUSTICE & ACCOUNTABILITY
870 Market Street, Suite 684
San Francisco, CA 94102
Tel: (415) 544-0444
Fax: (415) 544-0456

Paul Hoffman
SCHONBRUN DESIMONE SEPLOW HARRIS &
HOFFMAN LLP
723 Ocean Front Walk
Venice, CA 90291
Tel: (310) 396-0731
Fax: (310) 399-7040

Attorneys for Plaintiffs